UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 17-mj-300 (FLN)

UNITED STATES OF AMERICA, Plaintiff, v. AARON LEE BOSHEY, Defendant.	)	**JOINT MOTION OF THE PARTIES FOR EXTENSION OF TIME FOR FILING INDICTMENT**

The United States of America by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Assistant United States Attorney Clifford B. Wardlaw, and defendant Aaron Lee Boshey, by his attorney, Kevin Cornwell, Esq., jointly move the Court pursuant to 18 U.S.C. §3161(h)(7) for a thirty-day extension of time for filing the indictment in the above-captioned matter. The grounds for this motion are as follows:

1. On March 24, 2017, the defendant was arrested on a Complaint that charged the offense of Felon in Possession of a Firearm in violation of Title 18, United States Code, Section 922(g)(1) . Pursuant to 18 U.S.C. §§ 3161(b) and 3161(h), an indictment must be filed by April 24, 2016.

2. In the view of the parties, a thirty-day extension of the time period in which the United States is required to bring the matter before the grand jury serves the interests of the defendant, the public, and justice, as well as promoting judicial economy. Specifically, the parties have reached a pre-indictment plea agreement in principle. The parties expect to reduce the plea agreement to writing and for the defendant to enter his

plea of guilty within the next few weeks. The defendant's pre-indictment guilty plea would save the government substantial resources and allow the defendant to take prompt responsibility for his actions. However, a pre-indictment plea will not be possible without the requested extension.

3. Counsel for the defendant has consulted with the defendant about this extension request, and the defendant consents to the request and agrees that any period of delay is excluded from the calculation of time under the Speedy Trial Act.

For the foregoing reasons, the parties respectfully and jointly request that the motion for a thirty-day extension of time for filing the indictment in the above-captioned matter be granted. A proposed order accompanies this motion.

Dated: April 18, 2016 7

ANDREW M. LUGER
United States Attorney

BY: CLIFFORD B. WARDLAW
Assistant United States Attorney

Dated: April 18, 2017

AARON LEE BOSHEY
Defendant

Dated: April 18, 2017

KEVIN CORNWELL, ESQ.
Counsel for the defendant